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CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHI NGUYEN,

Plaintiff,

vs.

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC., *et al.*,

Defendants.

CASE NO.: 3-11-CV-00756-MMC

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE DISCOVERY AND MOTION
DEADLINES BY 30 DAYS; ORDER THEREON**

Motion To Be Decided on Papers

DEPT: Courtroom 7, 19th Floor

JUDGE: Hon. Maxine M. Chesney

ACTION FILED: February 18, 2011

TRIAL DATE: None

IT IS HEREBY STIPULATED AND AGREED by and among all parties that:

All deadlines related to the continued depositions of Chi Nguyen, Linda Garcia, and Scott Weber, as well as disclosure of rebuttal expert witnesses and reports related thereto shall be vacated and continued until January 31, 2012; and that motions related to rebuttal expert witnesses shall be vacated and continued accordingly.

A continuance of said deadlines is necessary because the parties have agreed to mediate before Vivien Williamson on December 13, 2012, and wish to abate these discovery costs in anticipation of mediation, while reserving their rights to engage in the discovery as necessary for preparation for trial if

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mediation is unsuccessful.

IT IS SO STIPULATED AND AGREED.

DATED: November 20, 2012

/s/

Michael R. Bracamontes, Esq.
Bracamontes & Vlasak, P.C.
Attorney for Plaintiff

DATED: November 20, 2012

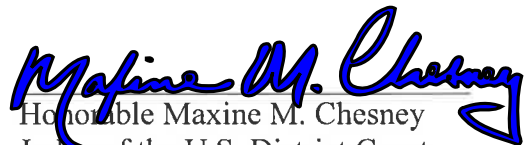
/s/

Cortney L. McDevitt, Esq.
Jackson Lewis, LLP
Attorney for Defendant

IT IS SO ORDERED that the deadlines concerning the continued depositions of Chi Nguyen, Linda Garcia, and Scott Weber, as well as for disclosure of rebuttal experts, are vacated and reset as follows:

1. The parties' deadline to complete the depositions of Chi Nguyen, Linda Garcia, and Scott Weber shall be January 31, 2013.
2. The parties' deadline to disclose rebuttal expert witnesses shall be January 31, 2013.
3. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be February 5, 2013.
4. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be March 7, 2013.
5. All other dates and deadlines shall remain unchanged.

Dated: November 26, 2012


Honorable Maxine M. Chesney
Judge of the U.S. District Court